

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re RCI Hospitality Holdings, Inc.
Securities Litigation

Master File No. 4:19-cv-01841-AHB

**DECLARATION OF KARA M. WOLKE IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR: (I) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;
(II) CERTIFICATION OF THE SETTLEMENT CLASS; AND (III) APPROVAL OF
NOTICE OF THE SETTLEMENT**

I, Kara M. Wolke, pursuant to 28 U.S.C. § 1746, hereby declare and state as follows:

1. I am an attorney duly licensed to practice law before all of the courts of the State of California and I am admitted *pro hac vice* in the above captioned action (the "Action"). I am a partner in the law firm of Glancy Prongay & Murray LLP, the Court-appointed Co-Lead Counsel in the Action. I make this declaration in support of Plaintiffs' Unopposed Motion for: (I) Preliminary Approval of Class Action Settlement; (II) Certification of the Settlement Class; and (III) Approval of the Notice of Settlement. I have personal knowledge of the matters stated herein, and if called upon, I could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of the Stipulation and Agreement of Settlement executed by the parties, dated April 14, 2022 (the "Stipulation").

3. Attached as Exhibit A to the Stipulation is a true and correct copy of the proposed Unopposed Order Preliminarily Approving Settlement and Providing for Notice.

4. Attached as Exhibit A-1 to the Stipulation is a true and correct copy of the Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II)

Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses.

5. Attached as Exhibit A-2 to the Stipulation is a true and correct copy of the Proof of Claim and Release Form.

6. Attached as Exhibit A-3 to the Stipulation is a true and correct copy of the Summary Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses.

7. Attached as Exhibit A-4 to the Stipulation is a true and correct copy of the Postcard Notice of (I) Pendency of Class Action, Certification of Settlement Class, and Proposed Settlement; (II) Settlement Fairness Hearing; and (III) Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses.

8. Attached as Exhibit B to the Stipulation is a true and correct copy of the Judgment Approving Class Action Settlement.

9. Attached as Exhibit 2 is a true and correct copy of the resume of Glancy Prongay & Murray LLP.

10. Attached as Exhibit 3 is a true and correct copy of the resume of The Rosen Law Firm, P.A.

11. Attached as Exhibit 4 is a true and correct copy of excerpts from Janeen McIntosh and Svetlana Starykh, *Recent Trends in Securities Class Action Litigation: 2021 Full-Year Review* (NERA Jan. 25, 2022).

12. Attached as Exhibit 5 is a true and correct copy of the settlement experience of Strategic Claims Services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this, the 15th day of April 15, 2022, at Los Angeles, California.

/s/ Kara M. Wolke
Kara M. Wolke

CERTIFICATE OF SERVICE

I certify that on April 15, 2022, a copy of this document was served on all counsel of record by operation of the Court's electronic filing system.

s/ Kara M. Wolke
Kara M. Wolke